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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

HEATHER STANLEY,

Defendant.

CASE NO. 1:20-CR-00045 NONE-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
[PROPOSED] FINDINGS AND ORDER

DATE: June 14, 2021
TIME: 2:30 p.m.
COURT: Jennifer L. Thurston

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on June 14, 2021.
2. By this stipulation, defendant now moves to continue the status conference until September 13, 2021, and to exclude time between June 14, 2021, and September 13, 2021, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has represented that the discovery associated with this case includes thousands of pages of reports, photographs, and evidence obtained pursuant to an email search warrant. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

b) Counsel for defendant desires additional time to consult with his client, to review the current charges, to conduct investigation and research related to those charges, to review and copy discovery for this matter, to discuss potential resolutions with his client, to prepare pretrial motions, and to otherwise prepare for trial.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him/her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of June 14, 2021 to September 13, 2021, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: June 9, 2021

PHILLIP A. TALBERT
Acting United States Attorney

/s/ VINCENTE A.
TENNERELLI

VINCENTE A. TENNERELLI
Assistant United States Attorney

1 Dated: June 9, 2021

/s/ DAVID A. TORRES

2 DAVID A. TORRES

Counsel for Defendant

3 HEATHER STANLEY

4
5 **[PROPOSED] FINDINGS AND ORDER**

6 IT IS SO FOUND AND ORDERED.

7
8 IT IS SO ORDERED.

9 Dated: June 9, 2021

/s/ Jennifer L. Thurston

10 CHIEF UNITED STATES MAGISTRATE JUDGE